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STATE OF OKLAHOMA v. TYSON FOODS RHONDA CRAIG November 27, 2006

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

* * * * *

STATE OF OKLAHOMA, et al.,)
)
Plaintiffs,)
)
vs.) Case No. 4:05-CV-00329-TCK-SAJ
)
TYSON FOODS, INC., et al.,)
)
Defendants.)

* * * * *

DEPOSITION OF RHONDA CRAIG
TAKEN ON BEHALF OF THE DEFENDANTS
ON NOVEMBER 27, 2006, BEGINNING AT 10:30 A.M.
IN OKLAHOMA CITY, OKLAHOMA
* * * * *

APPEARANCES:

MR. J. TREVOR HAMMONS, Attorney at Law, of the
Office of Attorney General, 4545 N. Lincoln Boulevard, Suite
260, Oklahoma City, Oklahoma 73105, appearing on behalf of
the PLAINTIFF.

MR. ROBERT A. NANCE, Attorney at Law, of the firm
Riggs, Abney, Neal, Turpen, Orbison & Lewis, 5801 N.
Broadway, Suite 101, Oklahoma City, Oklahoma 73118, appearing
on behalf of the PLAINTIFF.

MS. NICOLE M. LONGWELL & MR W. TYLER BEATY,
Attorneys at Law, of the firm Joyce, Paul & McDaniel, 1717
South Boulder Avenue, Suite 200, Tulsa, Oklahoma 74119,
appearing on behalf of the DEFENDANT PETERSON FARMS, INC.

(Appearances continued on Page 2)

REPORTED BY: DANIEL LUKE EPPS, CSR, RPR

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1 record in order to do so.
 2 MR. NANCE: I think our positions are
 3 clear.
 4 MS. LONGWELL: Give us one second,
 5 please.
 6 (Short break at 4:53 p.m., resumed at
 7 4:56 p.m.)
 8 MS. HILL: I would just like to make a
 9 record that on behalf of Cargill, Inc., and Cargill
 10 Turkey Production, LLC, that I reserve any right to
 11 notice the deposition of the custodian of record of
 12 the ODEQ relating to Cargill, Inc.'s first request
 13 for production of documents, Cargill Turkey
 14 Production's first request for production of
 15 documents, and any additional discovery that
 16 Cargill, Inc., or Cargill Turkey Production, LLC,
 17 may propound just for the record.
 18 MR. BOND: And I'm going to mirror
 19 Cargill's objection, and add that that relates to
 20 Tyson Foods, Inc., Tyson Poultry, Inc., and Tyson
 21 Chicken, Inc., and Cobb-Vantress, Inc., in respect
 22 to any and all document requests or
 23 interrogatories which the state has referred back
 24 through Rule 33D. With respect to documents
 25 that are contained here at the Oklahoma

1 but the records that we prepared are available to
 2 all of the defendants, and you at least have
 3 evidently elected to attend in reviewing, and on
 4 behalf of Ms. Craig, she'll read and sign the
 5 deposition.
 6 (Deposition concluded at 4:59 p.m.)
 7 * * * * *

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1 Department of Environmental Quality, Tyson and
 2 these other Tyson entities reserve the right to
 3 issue a severance regarding the records
 4 custodian's deposition or a person at the
 5 Oklahoma Department of Environmental Quality.
 6 MR. THOMPSON: I'm going to join in and
 7 mirror on behalf of George's, Inc., and George's
 8 Farms, Inc., and I would also like to point out
 9 that neither of those entities have served
 10 discovery at this point and would also like to
 11 reserve their right to serve up notice of a
 12 deposition in this case.
 13 MS. BRONSON: Simmons joins in the
 14 objection, and if requests are propounded and
 15 responses are given, Simmons obviously reserves
 16 the right to schedule a deposition of the custodian
 17 that's responsible for responding to those
 18 requests.
 19 MR. NANCE: Since everyone is reserving
 20 their rights, we'll reserve our rights as well to
 21 object at such time as any of those things is done.
 22 George's, I assume, understands it's invited to
 23 review the documents that are upstairs, and
 24 whether or not you participate in that, that's up
 25 to you, and Simmons has some requests, I think,

JURAT
 STATE OF OKLAHOMA VS. TYSON FOODS
 STATE OF OKLAHOMA)
)SS
 COUNTY OF _____)

I, Rhonda Craig, do hereby state under
 oath that I have read the above and foregoing
 deposition in its entirety and that the same is a
 full, true and correct transcription of my
 testimony so given at said time and place, except
 for the corrections noted.

 RHONDA CRAIG

Subscribed and sworn to before me, the
 undersigned Notary Public in and for the State of
 Oklahoma, by said witness, on this, the ____ day
 of _____, 2006.

 NOTARY PUBLIC

My Commission Expires: _____
 (DLE) PR FILE #9833